UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	NO. 3:22-cr-00282
)	JUDGE RICHARDSON
)	
GLEN CASADA and)	
CADE COTHREN,)	
)	
Defendants.)	

GLEN CASADA'S UNOPPOSED MOTION TO CONTINUE TRIAL DATE AND CORRESPONDING DEADLINES

The defendant Glen Casada, through counsel, requests that this Court continue the trial of this matter, presently set for October 25, 2022, and all pretrial filing deadlines. In support, the defendant would show as follows:

- 1. On August 22, 2022, the Grand Jury for the Middle District of Tennessee returned the above referenced Indictment. (Dkt. 3).
- 2. The following day, Mr. Casada appeared with counsel and entered a Not Guilty plea. (Dkt. 10).
- 3. By Order entered August 24, 2022, this Honorable Court scheduled the trial of this matter to begin on October 25, 2022. (Dkt. 17).
- 4. After the parties agreement to the Government's proposed protective order (see Dkt. 20), the Government produced pretrial disclosures to the defense on September 7, 2022. These materials included documents consisting of thousands of pages, multiple recordings, and contents of various devices seized and searched by law enforcement. Specifically, the production includes

805 files and 151 folders totaling 296 GB. The government's cover letter accompanying the above

referenced information also indicates that additional tranches of evidence will be produced in a

later production.

5. Mr. Casada intends to vigorously defend against the allegations in the indictment. In order

to effectively do so, both he and his counsel require sufficient time to evaluate and analyze all of

the Government's disclosures (both already made and to be made in the future), conduct his own

investigation into the Government's disclosures, and conduct his own independent investigation.

6. In light of the above, Mr. Casada submits that it is in the interest of justice to continue the

trial of this matter so that he can adequately prepare. This request is grounded in Mr. Casada's

constitutional rights to due process, a fair trial, and effective assistance of counsel.

7. A speedy trial waiver is attached to this Motion.

8. Undersigned counsel has consulted with the U.S. Attorney's Office regarding the requested

relief. The Government does not oppose the Motion.

Respectfully submitted,

/s/ Jonathan P. Farmer

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Counsel for Glen Casada

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following:

Amanda Klopf John Taddei Assistant US Attorneys US Attorney Office - Middle District 719 Church St. Suite 3300 Nashville, TN 37203 Amanda.klopf@usdoj.gov John.Taddei@usdoj.gov

> /s/ Jonathan P. Farmer Jonathan P. Farmer